



Matthew S. Trokenheim | Partner  
Direct 973.681.7024 | mtrokenheim@goldbergsegalla.com

January 26, 2021

VIA ECF

Hon. Laura Taylor Swain  
United States District Judge  
Daniel Patrick Moynihan  
United States Courthouse  
500 Pearl Street  
New York, New York 10007-1312

MEMO ENDORSED

**Re: Hoffman, v. Major Model Management, Inc.,  
Case No. 1:20-cv-06941(LTS)(JLC)  
Motion to Seal or Replace with Redacted Document**

Dear Judge Swain:

I write on behalf of defendant Major Model Management, Inc. (“MMMI”) pursuant to sections A.5 of Your Honor’s Individual Practices to request the permanent sealing of document 26-2 on the docket in the above-referenced action, and replacement with a version containing additional redactions.

On December 3, 2020, the court granted our motion to permanently seal an unredacted exhibit (ECF No. 16-6) containing personal information of plaintiff. We replaced that exhibit with one that redacted the first six digits of the plaintiff’s social security number, and the month and day of her birthday. (ECF No. 19-6). The motion that included that exhibit has been noted on the docket as “FILING ERROR – DEFICIENT DOCKET ENTRY.” We refiled the motion today at ECF No. 23, and the redacted exhibit as ECF No. 26-2.

We request permission to submit a new exhibit that redacts the entirety of the birthdate, the entirety of the social security number, the plaintiff’s home address, and the plaintiff’s passport number.

By this letter motion, I respectfully request that Document 16-6 remain sealed, that ECF No. 19-6 and 26-2 be permanently sealed as well, and that leave be given to replace the document on the docket with another redacted version containing the additional redactions noted above, in the form attached hereto.

Thank you for consideration of this matter.

Please send mail to our scanning center at: PO Box 880, Buffalo NY 14201

Laura Taylor Swain

January 26, 2021

Page 2

Respectfully submitted,

/s/ Matthew S. Trokenheim

Matthew S. Trokenheim

MST:

cc: All Counsel (via ECF)

The foregoing requests are granted. The Clerk of Court shall seal DE 19-6 and DE 26-2 , and make the accessible only by the plaintiff and the Court. DE# 27 resolved.

SO ORDERED.

1/28/2021

/s/ Laura Taylor Swain, USDJ